

# EXHIBIT C

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Anchorage Police Department  
Walt Monegan  
Officers Voss and Henikman

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF ALASKA**

CAROLYN MITCHELL,

Plaintiff,

vs.

ANCHORAGE POLICE DEPARTMENT and  
the MUNICIPALITY OF ANCHORAGE, a  
municipal corporation, WALTER MONEGAN,  
Officer HENIKMAN, and Officer J. VOSS,

Defendants.

Case No. 3:05-cv-00273-JWS

**OFFICER ROSS HENIKMAN'S RESPONSES TO PLAINTIFF'S**

**INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Defendant Officer Ross Henikman's responds to plaintiff's interrogatories and request for production dated October 2, 2006, as follows:

**MUNICIPALITY  
OF  
ANCHORAGE**

OFFICE OF THE  
MUNICIPAL ATTORNEY

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Anchorage, Alaska  
99519-6650

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**INTERROGATORY NO. 1:** What is your full name, badge or identification number, and date of birth?

**ANSWER:**

As to date of birth, objection, relevance; the information sought is neither relevant nor likely to lead to the discovery of any admissible evidence. Ross A. Henikman, DSN 28525.

**INTERROGATORY NO. 2:** If you were ever enjoined from engaging in any conduct by a state or federal court decree, identify the court, title and docket number of the case, date of decree, and nature of the conduct enjoined.

**ANSWER:**

N/A.

**INTERROGATORY NO. 3:** State specifically and in detail the date and exact sequence of events that took place during any incident between you and Plaintiff Carolyn Mitchell, including but not limited to the events on May 8, 2004.

**ANSWER:**

See my report produced as Bates Nos. 17-18.

**INTERROGATORY NO. 4:** Have you received any discipline from the Anchorage Police Department as a result of the incident involving Plaintiff Carolyn Mitchell on May 8, 2004? If yes, state:

- a. the nature of the discipline;
- b. the facts on which such discipline was based;
- c. who ordered and who administrated the disciplinary action.

Officer Ross Henikman's Responses to Plaintiff's ROG's & RFP's  
Case No. 3:05-cv-00273-JWS

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MUNICIPALITY  
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OFFICE OF THE  
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**ANSWER:**

No.

**INTERROGATORY NO. 5:** On May 9, 2004, you filed a police report supplemental for Case 04-20935, defendant bates stamped 000017 (attached), in this document you wrote the following: "I noted a female matching the suspect description that was broadcast over the radio exit." Explain in detail how, and to what extent, plaintiff Mitchell "matched" the description of the person who robbed the Wells Fargo at Sears Mall.

**ANSWER:**

Objection, the interrogatory fails to identify which suspect description, broadcast at what time. As the Calls for Service inquiry response shows (Bates Nos. 26-31) two or more descriptions were broadcast over the course of the police response. Notwithstanding objections, Plaintiff matched the various descriptions insofar as she was present near the scene of the crime, within a short time after the crime was committed, appeared to be a black female adult, could be described as "heavysset", and was carrying one or more bags.

**INTERROGATORY NO. 6:** On May 9, 2004, you filed a police report supplemental for Case 04-20935, defendant bates stamped 000017 (attached), in this document you wrote the following: "I stopped her and placed her in handcuffs." Explain in detail why, and under what circumstances, you in your official capacity as a police officer for the Anchorage Police Department made the decision to place plaintiff Mitchell in handcuffs.

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Officer Ross Henikman's Responses to Plaintiff's ROG's & RFP's  
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